



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Clay Long
Environmental Programs Manager
SAPA Extruder, Inc. – Mountain Top Operations
330 Elmwood Avenue – Crestwood Industrial park
Mountain Top, Pennsylvania 18707

Re: Discharge Limitations & Pollutant Monitoring Requirements
PAP245985

Dear Mr. Long:

On December 12th, 2013 the Environmental Protection Agency (EPA) issued a Discharge Limitations and Monitoring Requirements package to SAPA Extruder, Inc. for wastewater discharges to a publically owned treatment works. Based on information provided since that time, EPA is revising the standards listed in that notification package. Production data collected from January 1st, 2012 to December 31st, 2016 was used to update SAPA Extruder's discharge limitations.

Please note changes have been made to the reporting of production data. For future reports, production shall be reported for each regulated process (see attachment 1) or as a total production and a percentage of total production through each process.

As a reminder, in the event that a violation occurs, you are required to notify EPA within 24 hours of becoming aware of the violation. In addition, you are required to resample for those pollutants for which the violation occurred, and submit the results of the resampling within 30 days of becoming aware of the violation. Although not specifically required by the regulations, the 30-day report should also include the cause of the violation and the steps taken to ensure that it does not recur.

If you have any questions, please contact Ryan Shuart at (215) 814-2714, or by email at shuart.ryan@epa.gov, or John Lovell at (215) 814-5790 or by email at lovell.john@epa.gov.

Sincerely,

David McGuigan, Ph.D.
Associate Director

H:\3WP41\Pretreatment\IUS\CIUs\SAPA\Limits				CONCURRENCES			
SYMBOL	<	3WP41	3WP41	3WP41	3WP40		
SURNAME	<	R. Shuart	J. Lovell	B. Trulear	D. McGuigan		
DATE	<	3/10/17	3/10/17	3/10/17			

EPA Form 1320-1 (12-70)

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Customer Service Hotline: 1-800-438-2474

Office of NPDES Permits and Enforcement

Enclosure

cc: BR Patel, PADEP- Northeast Regional Office (w/enclosure)
Sean Furjanic, PADEP Central Office (w/out enclosure)

Discharge Limitations and Monitoring Requirements for:
 SAPA Extruders
 330 Elmwood Avenue
 Crestwood Industrial Park - Mountaintop PA 18707
 PAP245985

Such discharges shall be limited and monitored by the permittee as specified below:

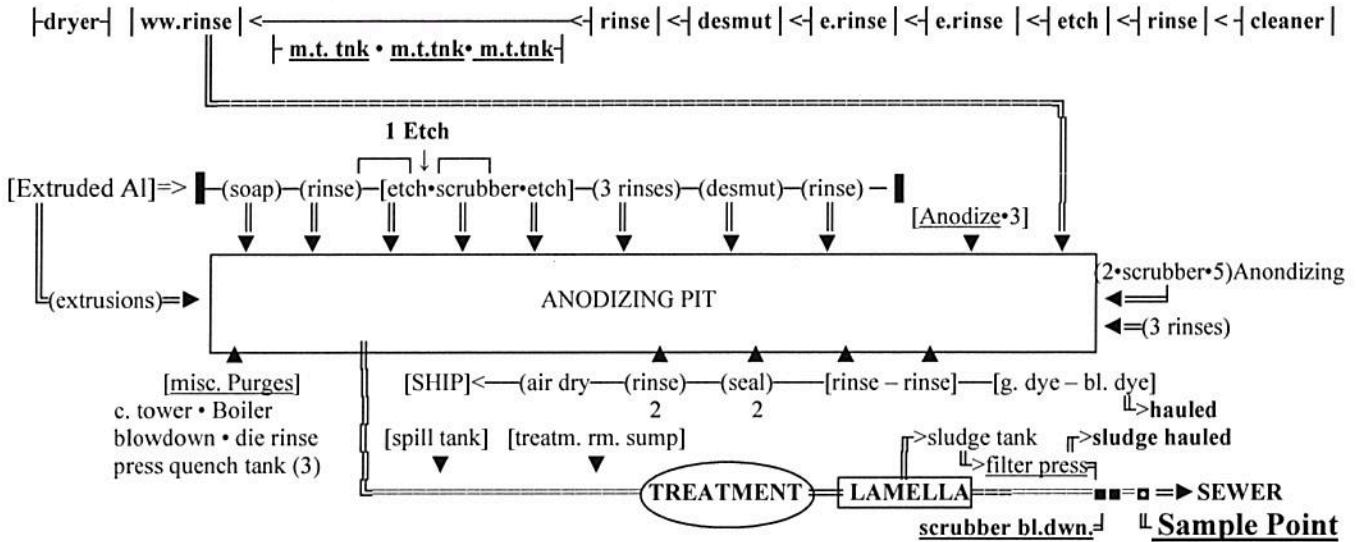
Parameter	Limitations (lbs./day) (2)		Monitoring Requirements (4)	
	Daily Maximum	Monthly Average	Frequency	Sample Type (5)
Flow (gpd)			1/month	Measured
Production Rate #/day (1)			1/month	Record
pH (3)			1/month	4 Grabs/low chart read
Chromium	0.5341	0.2162	1/6 months	4 Grabs
Zinc	1.4601	0.6051	1/6 months	4 Grabs
Cyanide	0.2880	0.1164	1/6 months	4 Grabs
Oil & Grease (6)	14.2960	14.2960	1/6 months	4 Grabs

1. Production Rate is the average production per discharge day processed through a given unit operation and is calculated by dividing the total production during the six-month reporting period by the number of discharge days during the six-month reporting period. Production shall be reported for each regulated process (see attachment 1) or as a total production and a percentage of total production through each process. The production rate used for each process is shown on attachment 1. Changes to the production rate will result in changes to the limits.
2. Pollutant discharge allocations are cumulative for the core (quench, etc.) and each ancillary (bath, rinse/multiple rinse, scrubber) operation.
3. pH shall not be less than 5.0 standard units at any time and shall be monitored at least once a month or continuously by a pH monitoring device.
4. Samples taken in compliance with the monitoring requirements specified above shall be collected from the WWTS1 effluent (see Attachment 2). Prior to discharge of any other process wastes, notification must be provided to both EPA and the local POTW.
5. Compliance sampling shall be conducted during the discharge period of 1 calendar day or 24-hour period and shall consist of a series of 4 separate grab samples taken over the discharge period. With the exception of pH, grab samples may be composited for a single analysis. Grab samples taken during a 24-hour period for oil & grease may be combined in the lab prior to analysis or analyzed separately and the test results averaged to derive a daily maximum value. Grab samples taken during a 24-hour period for cyanide and metals may be combined in the lab or in the field prior to analysis or analyzed separately and the test results averaged to derive a daily maximum value (see 40 CFR 403.12(g)(3)).
6. SAPA Extruders has chosen to conduct Oil and Grease monitoring as an Alternative to TTO monitoring.

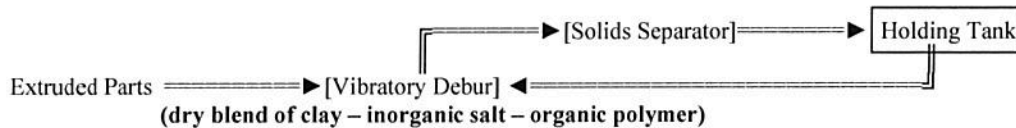
Attachment 2

SAPA Extruders Flow Schematic

Extrusion/Anodizing Process...WWT-1 (5/4/15)



Vibratory Debur Process...Closed Loop Process (SAPA 5/8/13)



Regulated Hauled Wastewater Processes (SAPA 5/4/2015)

no dump (scrubber/bldwn) => hauled
(br.dip)
(desmut)-(rinse)-(3 rinses) => hauled

